

George Haines, Esq.
Nevada Bar No. 9411
Gerardo Avalos, Esq.
Nevada Bar No. 15171
FREEDOM LAW FIRM, LLC
8985 South Eastern Ave., Suite 100
Las Vegas, NV 89123
ghaines@freedomlegalteam.com
gavalos@freedomlegalteam.com
Phone: (702) 880-5554
FAX: (702) 385-5518
Counsel for Plaintiff Gabriela Meza Silva

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

Gabriela Meza Silva,

Plaintiff,

v.

Equifax Information Services LLC; National
Consumer Telecom & Utilities Exchange, Inc.;
Clarity Services, Inc.; American Express
Company; The Goldman Sachs Group, Inc.; First
Bank & Trust; Bank of America, N.A.; Capital
One Bank, National Association and Discover
Financial Services, Inc.,

Defendants.

Case No.: 2:25-cv-00744

**Unopposed Motion for Extension of
Time for First Bank & Trust to Answer**
(First Request)

Gabriela Meza Silva (“Plaintiff”), hereby files this Unopposed Motion for Extension of Time for First Bank & Trust (“Defendant”) to Answer and in support states:

1. On May 6, 2025, Defendant was served with Plaintiff’s Complaint for Damages under the FCRA, 15 U.S.C. § 1681 (“Complaint”).
2. Accordingly, Defendant’s responsive pleading to the Complaint is due on May 27, 2025.
3. Defendant’s counsel has requested more time to complete their investigation of the Plaintiff’s claims and Defendant’s possible defenses.
4. In addition, Plaintiff and Defendant are actively engaged in case-resolution negotiations.

1 5. Plaintiff does not oppose an extension of Defendant's time to respond to the Complaint so
2 Defendant's counsel may complete its investigation into Plaintiff's claims and the parties may
3 continue to devote their energies to resolving this matter.

4 **6.** Therefore Plaintiff respectfully requests the Court for an extension of time for Defendant to
5 file its responsive pleading by 30 days, which is up to and including **June 26, 2025**.

6 7. This motion is filed in good faith and not for delay.

7 8. This is the first request for an extension of time for Defendant to answer the complaint and
8 the requested extension does not prejudice the parties.

9 **9.** For the foregoing reasons, Plaintiff requests that the Court issue an order extending the date
10 by which Defendant must answer or otherwise respond to Plaintiff's Complaint to **June 26,**
11 **2025.**

12 DATED May 27, 2025.

13
14
15 Respectfully submitted,

16 **FREEDOM LAW FIRM**

17
18 /s/ George Haines
19 George Haines, Esq.
20 Gerardo Avalos, Esq.
21 8985 S. Eastern Ave., Suite 100
22 Las Vegas, NV 89123
23 *Counsel for Plaintiff*

24 **GOOD CAUSE SHOWN, IT IS SO ORDERED:**

25 
26 **UNITED STATES MAGISTRATE JUDGE**

27 DATED: May 28, 2025
28